

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RENA SAMPAYAN,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE
& RUBBER COMPANY; PIRELLI & C.
S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE
AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-00881-ER

Judge: Hon. Edgardo Ramos

CATIP ISLAMI,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS MICHELIN SCA;
COMPAGNIE FINANCIÈRE MICHELIN SA;
MICHELIN NORTH AMERICA, INC.;
NOKIAN TYRES PLC; NOKIAN TYRES
INC.; NOKIAN TYRES U.S. OPERATIONS
LLC; THE GOODYEAR TIRE & RUBBER
COMPANY; PIRELLI & C. S.P.A.; PIRELLI
TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE
AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-00967

JAMES ALFORD, individually and on behalf
of all other similarly situated,

Plaintiff,

v.

BRIDGESTONE CORPORATION;
BRIDGESTONE AMERICAS, INC.;
CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS MICHELIN SCA;
COMPAGNIE FINANCIÈRE MICHELIN SA;
MICHELIN NORTH AMERICA, INC.;
NOKIAN TYRES PLC; NOKIAN TYRES
INC; NOKIAN TYRES U.S. OPERATIONS
LLC; THE GOODYEAR TIRE & RUBBER
COMPANY; PIRELLI & C. S.P.A.; PIRELLI
TIRE LLC; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-01038

MICHELE EDWARDS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE
& RUBBER COMPANY; PIRELLI & C.
S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE
AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-01092

MARCO A. TORRES, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE
& RUBBER COMPANY; PIRELLI & C.
S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE
AMERICAS, INC.; DOES 1-100,

Defendants.

Case No. 1:24-cv-01124

SUSAN DAVIDOV and ROBERT FURST,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS; MICHELIN NORTH
AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE
& RUBBER COMPANY; PIRELLI & C.
S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE
AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-01367

MICHAEL CURRAN and TIMOTHY
BORLAND, individually and behalf of all
others similarly situated,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY; COMPAGNIE GÉNÉRALE DES
ÉTABLISSEMENTS MICHELIN SCA;
MICHELIN NORTH AMERICA INC.;
BRIDGESTONE CORPORATION;
BRIDGESTONE AMERICAS, INC.;
CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; NOKIAN TYRES PLC; NOKIAN
TYRES NORTH AMERICA, INC.; NOKIAN
TYRES INC.; NOKIAN TYRES U.S.
OPERATION LLC; PIRELLI & C. S.P.A;
PIRELLI TIRE LLC; HANKOOK TIRE &
TECHNOLOGY CO., LTD.; HANKOOK
TIRE AMERICA CORP.; YOKOHAMA
RUBBER CO., LTD.; YOKOHAMA TIRE
CORPORATION; TOYO TIRE
CORPORATION; TOYO TIRE U.S.A. CORP.;
KUMHO TIRE CO.; KUMHO TIRE U.S.A.;
SUMITOMO RUBBER INDUSTRIES, LTD.;
SUMITOMO RUBBER NORTH AMERICA,
INC.; GITI TIRE GLOBAL TRADING PTE.
LTD.; AND GITI TIRE (USA) LTD.,

Defendants.

Case No. 1:24-cv-01419

DANIEL PURCELL, LUKE CUDDY, and
ELIZABETH TWITCHELL, Individually and
On Behalf of All Others Individually Situated,

Plaintiffs,

v.

CONTINENTAL AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE AMERICAS,
LLC; COMPAGNIE GÉNÉRALE DES

Case No. 1:24-00938

ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC; NOKIAN TYRES INC; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

WILKERSON FARMS ET, LLC, on behalf of itself and all others similarly situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC; NOKIAN TYRES INC; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-00970

FRANK NOVAK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC;

Case No. 1:24-cv-01202

NOKIAN TYRES INC.; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

MICHAEL SPADAFINO, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH AMERICA, INC.; NOKIAN TYRES PLC; NOKIAN TYRES INC; NOKIAN TYRES U.S. OPERATIONS LLC; THE GOODYEAR TIRE & RUBBER COMPANY; PIRELLI & C. S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE CORPORATION; BRIDGESTONE AMERICAS, INC.; AND DOES 1-100,

Defendants.

Case No. 1:24-cv-01452

LAURA AMMONS, BRANDON DERRICK, LETIA DICKERSON, JEFFREY HOLT, JERRY MERKEL, and LYNN SEDA, Individually and On Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CONTINENTAL AKTIENGESELLSCHAFT; CONTINENTAL TIRE THE AMERICAS, LLC; COMPAGNIE GÉNÉRALE DES ÉTABLISSEMENTS; MICHELIN NORTH

Case No. 1:24-cv-01513

AMERICA, INC.; NOKIAN TYRES PLC;
NOKIAN TYRES INC; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR TIRE
& RUBBER COMPANY; PIRELLI & C.
S.P.A.; PIRELLI TIRE LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE
AMERICAS, INC.; AND DOES 1-100,

Defendants.

**NOTICE OF MOTION
FOR CONSOLIDATION AND COORDINATION**

PLEASE TAKE NOTICE that, based upon the accompanying Memorandum of Law in Support of Direct Purchaser and Indirect Purchaser Plaintiffs’ Motion for Consolidation and Coordination dated March 13, 2024, and all prior pleadings, papers, and proceedings in this matter, Plaintiffs Sampayan, Islami, Alford, Edwards, Torres, Davidov, Furst, Curran, and Borland (collectively, “the Direct Purchaser Plaintiffs”) and Plaintiffs Purcell, Cuddy, Twitchell, Wilkerson Farms ET, LLC, Novak, Spadafino, Ammons, Derrick, Dickerson, Holt, Merkel, and Seda (collectively, “the Indirect Purchaser Plaintiffs”), by and through the undersigned counsel move this Court before the Honorable Edgardo Ramos, United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time to be designated by the Court, for an Order separately consolidating the Related Direct Purchaser and Related Indirect Purchaser Actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and directing that the consolidated actions be coordinated with one another to the extent practicable.

Dated: March 13, 2024

Respectfully submitted,

/s/ Dena C. Sharp

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*Attorneys for Plaintiff Spadafino and the proposed
Indirect Purchaser Plaintiff Class*

*(*pro hac vice forthcoming)*

CERTIFICATE OF SERVICE

I, Gregory B. Linkh, hereby certify that on March 13, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all registered users.

/s/ Gregory B. Linkh